

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 05-03124-05-CR-S-GAF
	)	
<b>DREW N. TURNER,</b>	)	
	)	
Defendant.	)	

**UNITED STATES' RESPONSE TO DEFENDANT'S  
MOTION TO SET CONDITIONS OF PRETRIAL RELEASE**

COMES NOW the United States, by and through Todd P. Graves, United States Attorney for the Western District of Missouri, and the undersigned Special Assistant United States Attorney, and files the *United States' Response to Defendant's Motion to Set Conditions of Pretrial Release*.

The government remains steadfast to its previously espoused position that no condition or combination of conditions will reasonably assure defendant's appearance or assure the safety of the community. At the conclusion of the detention hearing held on December 15, 2005, this Court ordered that the defendant be detained without bail. Defendant's motion has failed to provide new or relevant factors sufficient to rebut the presumption of both dangerousness and a risk of flight.

**WHEREFORE,** the United States respectfully requests that the Court deny defendant's *Request for Bond*.

Respectfully submitted,

Todd P. Graves  
United States Attorney

By /s/ Kimberly R. Weber Dean  
Kimberly R. Weber Dean  
AR Bar # 94207 & TX Bar # 24030672  
Special Assistant United States Attorney  
901 St. Louis Street, Suite 500  
Springfield, Missouri 65806-2511  
417/831-1040

**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing was delivered on January 3, 2006, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Kimberly R. Weber Dean  
Kimberly R. Weber Dean  
Special Assistant United States Attorney